

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : CRIMINAL NO.

v. : DATE FILED:

JEREMI MICHAEL CONAWAY : VIOLATIONS:
: **18 U.S.C. § 1349 (conspiracy to commit mail**
: **and wire fraud – 1 count)**
: **18 U.S.C. § 1341 (mail fraud – 3 counts)**
: **18 U.S.C. § 1343 (wire fraud – 1 count)**
Notice of forfeiture

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times relevant to this information:

1. The United States Golf Association (“USGA”) was a non-profit organization with its headquarters in Liberty Corner, New Jersey, whose mission was to champion and advance the game of golf. The USGA was the governing body for golf in the United States, its territories, and Mexico. The USGA not only produced and interpreted the rules of golf as well as provided a national handicap system for golfers, it also conducted 14 national championship tournaments, including the U.S. Men’s Open (the “U.S. Open”), U.S. Women’s Open, and U.S. Senior Open. Certain USGA championship tournaments were ticketed events, including the U.S. Open.

2. The U.S. Open was considered by many golf enthusiasts to be one of the highlights of the golf season. The U.S. Open was conducted by the USGA and was held in the United States in June of each year at select host venue clubs. It was one of the four major championships in men's golf. The U.S. Open was the largest revenue generating event for the USGA on an annual basis. The USGA sold various types of tickets to the U.S. Open, the pricing of which would range each year depending on the type of ticket offering, and would generally include: single day mid-week gallery admission tickets (starting at approximately \$50 per ticket); full week gallery admission tickets (for approximately \$500 per ticket); and single day, multi-day and week-long package tickets for its various club-levels, ranging from the "Trophy Club," which provided access to an on-site, air conditioned pavilion that offered food and beverage for purchase (starting at approximately \$75 for a single-day mid-week ticket to approximately \$245 for a weekend single-day ticket), to the "1895 Club," which provided all-inclusive access to a separate, on-site, air-conditioned pavilion featuring breakfast, buffet lunch with hot entrees, afternoon snacks and full bar service (starting at approximately \$250 for a single-day mid-week ticket to approximately \$585 for a single-day weekend ticket).

3. The 2013 U.S. Open was held at the Merion Golf Club in Ardmore, Pennsylvania. The 2014 U.S. Open was held at the Pinehurst Resort in Pinehurst, North Carolina. The 2015 U.S. Open was held at Chambers Bay in University Place, Washington. The 2016 U.S. Open was held at the Oakmont Country Club in Oakmont, Pennsylvania. The 2017 U.S. Open was held at Erin Hills in Erin, Wisconsin. The 2018 U.S. Open was held at the Shinnecock Hills Golf Club in Southampton, New York. The 2019 U.S. Open was held at the Pebble Beach Golf Links in Pebble Beach, California.

4. A ticket broker was a person or entity involved in the business of reselling tickets of admission to places of entertainment. Ticket brokers typically charged a premium in excess of the face value of the tickets. Tickets sold by a ticket broker might or might not be authorized by the official seller.

5. The USGA sold tickets to certain championships, including the U.S. Open, through its website, through telephone calls to the USGA Admission's Office, or through select authorized ticket sellers. The USGA imposed strict limits on the number of tickets sold to any one person or entity to a maximum of approximately 20 tickets. The purpose of the limit was to maintain price integrity and to prevent ticket brokers and other persons from purchasing large batches of tickets and reselling them to the public.

6. From 2013 through 2019, the USGA generated revenues of approximately \$200,000,000 per year, with its two largest sources of revenue consisting of its sale of media rights to and ticket sales for admission to its national championship tournaments. The USGA relied on ticket sales to its championship events to continue operations and fulfill its mission. Ticket sales from 2013 through 2019 generated varying annual revenues from between approximately \$16 million to approximately \$25 million. Other revenue sources for the USGA included competitor entry fees, merchandise sold on-site at the championships, sales of corporate hospitality packages, corporate merchandise sales, royalties associated with the manufacture and sales of merchandise bearing USGA marks, and revenue from the sales of food and beverages.

7. Co-conspirator Robert Fryer, charged separately, was employed by the USGA in the USGA Admissions Office. As a result of his employment, Fryer had access to U.S. Open tickets that the USGA maintained at its headquarters in Liberty Corner, New Jersey, and that the USGA maintained on-site at the various U.S. Open tournaments. Neither Fryer, nor any

other USGA personnel in the USGA Admissions Office, were ever authorized to provide tickets to USGA tournaments to individuals and/or ticket brokers at zero cost for resale on the secondary market. Similarly, neither Fryer, nor any other USGA personnel in the USGA Admissions Office, were ever authorized to sell USGA tournament tickets and keep the proceeds of those sales for their own benefit. Instead, all ticket sales were required to be made through the USGA as an entity, with all payments for tickets to be made to the USGA.

8. Defendant JEREMI MICHAEL CONAWAY served first as an employee, and later a Vice President of Operations for Company #1, a secondary ticket marketing company (*i.e.*, ticket broker) that was located and operated in the Eastern District of Pennsylvania, from in or about June 2000 until on or about February 14, 2016.

9. On or about October 28, 2014, defendant JEREMI MICHAEL CONAWAY established Eagle Eye Ticketing Management, LLC (“Eagle Eye”), a secondary ticket marketing company (*i.e.*, ticket broker) that was located and operated in the Eastern District of Pennsylvania. Defendant CONAWAY was Eagle Eye’s President. At all times since its inception, defendant CONAWAY has been the sole owner of Eagle Eye.

10. Defendant JEREMI MICHAEL CONAWAY sold tickets to various concerts and sporting events, including the U.S. Open, through Company #1 (as a Company #1 employee) and Eagle Eye (as the owner of Eagle Eye).

11. Co-conspirator Robert Fryer maintained a bank account at Santander Bank (formerly Sovereign Bank) ending in 1417.

12. Co-conspirator Robert Fryer maintained a bank account at TD Bank ending in 1821.

13. Co-conspirator Robert Fryer utilized a Gmail email account hosted by Google LLC (“Google”). Google did not maintain any data centers in Pennsylvania. Google maintained data centers in Alabama, North Carolina, South Carolina, Virginia, Tennessee, Georgia, Texas, Oklahoma, Ohio, Iowa, Nevada, and Oregon. All emails sent to or from a Gmail email account traveled electronically via wire from the location of origin, through one of the Google data centers.

THE CONSPIRACY

14. Beginning in or about March 2013 and continuing until in or about March 2020, in the Eastern District of Pennsylvania, the District of New Jersey, and elsewhere, defendant

JEREMI MICHAEL CONAWAY

conspired and agreed, with others known and unknown to the United States Attorney, to commit offenses against the United States, that is, to devise a scheme to defraud and obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing this scheme cause the transmission of wire and mail communications in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1341 and 1343.

MANNER AND MEANS

It was part of the conspiracy that:

15. Co-conspirator Robert Fryer agreed with defendant JEREMI MICHAEL CONAWAY, and others known and unknown to the United States Attorney, that Fryer would misappropriate U.S. Open tickets from the USGA and defendant CONAWAY would sell them in return for payments to Fryer.

16. Starting in advance of the 2013 U.S. Open tournament that was held at the Merion Golf Club in Ardmore, Pennsylvania, and continuing each year through the 2019 U.S. Open tournament that was held at the Pebble Beach Golf Links in Pebble Beach, California, co-conspirator Robert Fryer misappropriated tickets to each U.S. Open tournament, without the knowledge and consent of the USGA, from the USGA's headquarters in Liberty Corner, New Jersey, and also on-site at various U.S. Open tournaments.

17. Defendant JEREMI MICHAEL CONAWAY communicated with co-conspirator Robert Fryer in interstate commerce by email, text, telephone, and through encrypted messaging applications.

18. Co-conspirator Robert Fryer provided the misappropriated U.S. Open tournament tickets to defendant JEREMI MICHAEL CONAWAY, and others known and unknown to the United States Attorney, through in-person meetings in the Eastern District of Pennsylvania and at various U.S. Open tournaments, and by shipping the tickets via private commercial interstate carriers, such as the United Parcel Service ("UPS") and Federal Express ("FedEx").

19. Defendant JEREMI MICHAEL CONAWAY sold the U.S. Open tickets provided by co-conspirator Robert Fryer first through Company #1 and then through Eagle Eye, for a profit.

20. Defendant JEREMI MICHAEL CONAWAY paid co-conspirator Robert Fryer for the U.S. Open tickets Fryer provided and defendant CONAWAY sold by giving Fryer cash and checks made payable to Fryer.

21. Co-conspirator Robert Fryer deposited some of the cash he received from defendant JEREMI MICHAEL CONAWAY into his Santander Bank account ending in 1417 in the Eastern District of Pennsylvania and elsewhere.

22. Co-conspirator Robert Fryer deposited some of the cash he received from defendant JEREMI MICHAEL CONAWAY into his TD Bank account ending in 1821 in the Eastern District of Pennsylvania and elsewhere.

23. In connection with, and during and in advance of the 2013 U.S. Open held at the Merion Golf Club in Ardmore, Pennsylvania, co-conspirator Robert Fryer misappropriated approximately 1,956 USGA admission tickets, with a face value of approximately \$237,690, and provided them to defendant JEREMI MICHAEL CONAWAY in person in the Eastern District of Pennsylvania, in return for the payment of approximately \$156,000 cash, all without the knowledge and consent of the USGA.

24. In or about June 2013, defendant JEREMI MICHAEL CONAWAY sold, through Company #1, approximately 1,956 misappropriated 2013 U.S. Open tournament tickets, with a face value of approximately \$237,690, provided by co-conspirator Robert Fryer, for at least approximately \$310,000.

25. Between in or about January 2014 and in or about June 2014, defendant JEREMI MICHAEL CONAWAY sold, through Company #1, approximately 860 misappropriated 2014 U.S. Open tournament tickets, with a face value of approximately \$105,250, provided by co-conspirator Robert Fryer.

26. Between in or about January 2015 and in or about June 2015, defendant JEREMI MICHAEL CONAWAY sold, through Company #1, approximately 2,102

misappropriated 2015 U.S. Open tournament tickets, with a face value of approximately \$431,290, provided by co-conspirator Robert Fryer.

27. Between in or about January 2015 and in or about June 2019, defendant JEREMI MICHAEL CONAWAY, through Eagle Eye, sold approximately 10,586 misappropriated 2015 through 2019 U.S. Open tournament tickets provided by co-conspirator Robert Fryer, with a face value of approximately, \$1,654,235, for at least approximately \$1,789,853, for which defendant CONAWAY paid Fryer approximately \$513,719.

OVERT ACTS

In furtherance of the conspiracy, and to achieve its objects, defendant JEREMI MICHAEL CONAWAY, and other co-conspirators known and unknown to the United States Attorney, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about April 7, 2016, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer indicating that defendant CONAWAY needed a total of approximately 1,031 misappropriated 2016 U.S. Open tickets (consisting of approximately 416 week-long gallery admission tickets, approximately 10 week-long Trophy Club admission tickets, approximately 385 single-day gallery admission tickets, and approximately 220 single-day Trophy Club admission tickets).

2. On or about April 13, 2016, co-conspirator Robert Fryer sent an email to defendant JEREMI MICHAEL CONAWAY asking if all of the approximately 416 week-long gallery admission tickets and approximately 10 week-long Trophy Club admission tickets that defendant CONAWAY needed had to be shipped by the same date, and asking if defendant

CONAWAY could provide Fryer with an additional approximately \$5,000, which Fryer explained “would be huge.”

3. On or about May 11, 2016, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer, attaching a UPS air bill, and instructing Fryer to use the air bill to ship approximately 92 misappropriated 2016 U.S. Open tickets (consisting of approximately 58 single-day gallery admission tickets and approximately 34 single-day Trophy Club admission tickets) to a customer of defendant CONAWAY, a ticket broker located in Encino, California.

4. On or about May 11, 2016, co-conspirator Robert Fryer caused approximately 92 misappropriated 2016 U.S. Open tickets to be shipped via UPS (tracking number ending in 0085) to defendant JEREMI MICHAEL CONAWAY’s customer in Encino, California.

5. On or about May 12, 2016, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer, attaching a UPS air bill, and instructing Fryer to use the air bill to ship approximately 20 misappropriated 2016 U.S. Open tickets (consisting of approximately 20 single-day Trophy Club admission tickets) to a customer of defendant CONAWAY, a ticket broker located in Encino, California.

6. On or about May 12, 2016, co-conspirator Robert Fryer caused approximately 20 misappropriated 2016 U.S. Open tickets to be shipped via UPS to defendant JEREMI MICHAEL CONAWAY’s customer in Encino, California, with a tracking number ending in 5097.

7. On or about May 23, 2016, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer, attaching a UPS air bill, and instructing Fryer to

use the air bill to ship approximately 16 misappropriated 2016 U.S. Open tickets (consisting of approximately 4 week-long gallery admission tickets and approximately 12 week-long Trophy Club admission tickets) to a customer of defendant CONAWAY, a ticket broker located in Encino, California.

8. On or about May 23, 2016, co-conspirator Robert Fryer caused approximately 16 misappropriated 2016 U.S. Open tickets to be shipped via UPS (tracking number ending in 5006) to defendant JEREMI MICHAEL CONAWAY's customer in Encino, California.

9. On or about May 24, 2016, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer, attaching a UPS air bill, and instructing Fryer to use the air bill to ship approximately 28 misappropriated 2016 U.S. Open tickets (consisting of approximately 14 week-long gallery admission tickets and approximately 14 week-long Trophy Club admission tickets) to a customer of defendant CONAWAY in Encino, California.

10. On or about May 24, 2016, co-conspirator Robert Fryer caused approximately 28 misappropriated 2016 U.S. Open tickets to be shipped via UPS (tracking number ending in 7154) to defendant JEREMI MICHAEL CONAWAY's customer in Encino, California.

11. On or about May 27, 2016, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer, attaching four UPS air bills, and instructing Fryer to use the air bills to ship approximately 11 misappropriated 2016 U.S. Open tickets (consisting of approximately 11 single-day Trophy Club admission tickets) to customers of defendant CONAWAY located in Encino, California, Pittsburgh, Pennsylvania, Bucyrus, Ohio, and Mars, Pennsylvania.

12. On or about May 27, 2016, co-conspirator Robert Fryer caused approximately 3 misappropriated 2016 U.S. Open tickets to be shipped via UPS (tracking number ending in 9854) to defendant JEREMI MICHAEL CONAWAY's customer in Encino, California.

13. On or about May 27, 2016, co-conspirator Robert Fryer caused approximately 3 misappropriated 2016 U.S. Open tickets to be shipped via UPS (tracking number ending in 9122) to defendant JEREMI MICHAEL CONAWAY's customer in Pittsburgh, Pennsylvania.

14. On or about May 27, 2016, co-conspirator Robert Fryer caused approximately 4 misappropriated 2016 U.S. Open tickets to be shipped via UPS (tracking number ending in 8463) to defendant JEREMI MICHAEL CONAWAY's customer in Bucyrus, Ohio.

15. On or about May 27, 2016, co-conspirator Robert Fryer caused approximately one misappropriated 2016 U.S. Open ticket to be shipped via UPS (tracking number ending in 4678) to defendant JEREMI MICHAEL CONAWAY's customer in Mars, Pennsylvania.

16. On or about May 31, 2016, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer, attaching a UPS air bill, and instructing Fryer to use the air bill to ship approximately 100 misappropriated 2016 U.S. Open tickets (consisting of approximately 100 week-long gallery admission tickets) to a customer of defendant CONAWAY, a ticket broker located in Austin, Texas.

17. On or about May 31, 2016, co-conspirator Robert Fryer caused approximately 100 misappropriated 2016 U.S. Open tickets to be shipped via UPS (tracking

number ending in 0560) to defendant JEREMI MICHAEL CONAWAY's customer in Austin, Texas.

18. On or about June 3, 2016, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer, attaching four UPS air bills, and instructing Fryer to use the air bills to ship approximately 38 misappropriated 2016 U.S. Open tickets to a customer of defendant CONAWAY, a ticket broker located in Austin, Texas.

19. On or about June 3, 2016, co-conspirator Robert Fryer caused approximately 38 misappropriated 2016 U.S. Open tickets to be shipped via UPS (tracking number ending in 6137) to defendant JEREMI MICHAEL CONAWAY's customer in Austin, Texas.

20. On or about June 6, 2016, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer, attaching a FedEx air bill, and instructing Fryer to use the air bill to ship approximately 56 misappropriated 2016 U.S. Open tickets (consisting of approximately 56 single-day Trophy Club admission tickets) to a customer of defendant CONAWAY, a ticket broker located in Austin, Texas.

21. On or about June 6, 2016, co-conspirator Robert Fryer caused approximately 56 misappropriated 2016 U.S. Open tickets to be shipped via FedEx (tracking number ending in 8690) to defendant JEREMI MICHAEL CONAWAY's customer in Austin, Texas.

22. On or about June 6, 2016, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer, attaching a UPS air bill, and instructing Fryer to use the air bill to ship approximately one misappropriated 2016 U.S. Open ticket (consisting of

approximately one single-day Trophy Club admission ticket) to a customer of defendant CONAWAY located in Pittsburgh, Pennsylvania.

23. On or about June 6, 2016, co-conspirator Robert Fryer caused approximately one misappropriated 2016 U.S. Open ticket to be shipped via UPS (tracking number ending in 4921) to defendant JEREMI MICHAEL CONAWAY's customer in Pittsburgh, Pennsylvania.

24. On or about June 6, 2016, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer, attaching a UPS air bill, and instructing Fryer to use the air bill to ship approximately 38 misappropriated 2016 U.S. Open tickets (consisting of approximately 38 week-long gallery admission tickets) to defendant CONAWAY in the Eastern District of Pennsylvania.

25. On or about June 6, 2016, co-conspirator Robert Fryer caused approximately 38 misappropriated 2016 U.S. Open tickets to be shipped via UPS (tracking number ending in 9332) to defendant JEREMI MICHAEL CONAWAY in the Eastern District of Pennsylvania.

26. On or about June 7, 2016, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer, attaching a UPS air bill, and instructing Fryer to use the air bill to ship approximately 56 misappropriated 2016 U.S. Open tickets (consisting of approximately 56 single-day Trophy Club admission tickets) to a customer of defendant CONAWAY, a ticket broker located in Austin, Texas.

27. On or about June 7, 2016, co-conspirator Robert Fryer caused approximately 56 misappropriated 2016 U.S. Open tickets to be shipped via UPS (tracking

number ending in 4482) to defendant JEREMI MICHAEL CONAWAY's customer in Austin, Texas.

28. On or about June 8, 2016, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer, attaching a UPS air bill, and instructing Fryer to use the air bill to ship approximately three misappropriated 2016 U.S. Open tickets (consisting of approximately three single-day Trophy Club admission tickets) to a customer of defendant CONAWAY located in Pittsburgh, Pennsylvania.

29. On or about June 8, 2016, co-conspirator Robert Fryer caused approximately three misappropriated 2016 U.S. Open tickets to be shipped via UPS (tracking number ending in 2689) to defendant JEREMI MICHAEL CONAWAY's customer in Pittsburgh, Pennsylvania.

30. On or about April 7, 2017, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer indicating that defendant CONAWAY was expecting Fryer to ship a total of approximately 3,613 misappropriated 2017 U.S. Open tickets for defendant CONAWAY (consisting of approximately 450 week-long gallery admission tickets, approximately 60 week-long Trophy Club admission tickets, approximately 30 week-long 1895 Club admission tickets, approximately 2,055 single-day gallery admission tickets, approximately 1,000 single-day Trophy Club admission tickets, and approximately 18 single-day 1895 Club admission tickets), and that defendant CONAWAY would pay Fryer another approximately \$30,000 once all of those tickets shipped.

31. On or about May 30, 2017, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer indicating that defendant CONAWAY was still

waiting for Fryer to provide approximately 691 misappropriated 2017 U.S. Open tickets in order for defendant CONAWAY to fulfill his outstanding customer ticket orders.

32. On or about June 1, 2017, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer indicating that defendant CONAWAY was still waiting for Fryer to provide approximately 592 misappropriated 2017 U.S. Open tickets in order for defendant CONAWAY to fulfill his outstanding customer ticket orders.

33. On or about November 1, 2017, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer indicating that defendant CONAWAY had pre-sold approximately 438 2018 U.S. Open tickets already.

34. On or about May 24, 2018, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer containing a list of the outstanding 2018 U.S. Open tickets defendant CONAWAY was still expecting to receive from co-conspirator Fryer.

35. On or about May 31, 2018, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer, attaching two UPS air bills, and instructing Fryer to use the air bills to ship misappropriated 2018 U.S. Open tickets to an employee of defendant CONAWAY in the Eastern District of Pennsylvania, and to a customer of defendant CONAWAY, a ticket broker located in Austin, Texas, and to inform defendant CONAWAY how many tickets Fryer would be sending in each shipment.

36. On or about May 31, 2018, co-conspirator Robert Fryer caused misappropriated 2018 U.S. Open tickets to be shipped via UPS (tracking number ending in 5535) to defendant JEREMI MICHAEL CONAWAY's customer in Austin, Texas.

37. On or about June 1, 2018, co-conspirator Robert Fryer caused misappropriated 2018 U.S. Open tickets to be shipped via UPS (tracking number ending in 5686) to defendant JEREMI MICHAEL CONAWAY in the Eastern District of Pennsylvania.

38. On or about June 1, 2018, defendant ROBERT FRYER caused misappropriated 2018 U.S. Open tickets to be shipped via UPS (tracking number ending in 5677) to defendant JEREMI MICHAEL CONAWAY in the Eastern District of Pennsylvania.

39. On or about June 7, 2018, defendant JEREMI MICHAEL CONAWAY sent an email to co-conspirator Robert Fryer, attaching a UPS air bill, and instructing Fryer to use the air bill to ship approximately 148 misappropriated 2018 U.S. Open tickets (consisting of approximately 148 four-day [Thursday through Sunday] gallery admission tickets) to a customer of defendant CONAWAY, a ticket broker located in Austin, Texas, and further instructing Fryer to provide another approximately 254 misappropriated 2018 U.S. Open tickets (consisting of approximately 216 single-day gallery admission tickets and approximately 38 single-day Trophy Club admission tickets) to an individual who would pick them up from Fryer in person in Southampton, New York, at the direction of defendant CONAWAY.

40. On or about June 7, 2018, co-conspirator Robert Fryer caused approximately 148 misappropriated 2018 U.S. Open tickets to be shipped via UPS (tracking number ending in 6892) to defendant JEREMI MICHAEL CONAWAY's customer in Austin, Texas.

41. On or about May 18, 2019, defendant ROBERT FRYER caused misappropriated 2019 U.S. Open tickets to be shipped via UPS (tracking number ending in 6939) to defendant JEREMI MICHAEL CONAWAY in the Eastern District of Pennsylvania.

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO THROUGH FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 13 of Count One are incorporated here.

THE SCHEME

2. Beginning in or about March 2013 and continuing until in or about March 2020, within the Eastern District of Pennsylvania, the District of New Jersey, and elsewhere, defendant

JEREMI MICHAEL CONAWAY,

together and with co-schemers known to the United States Attorney, devised and intended to devise a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

3. Paragraphs 15 through 27 of Count One are incorporated here.

MAIL FRAUD

4. On or about each of the following dates, in the Eastern District of Pennsylvania, and elsewhere, defendant

JEREMI MICHAEL CONAWAY,

alone and with one or more co-schemers known to the United States Attorney, for the purpose of executing the scheme described above, and attempting to do so, knowingly caused to be delivered by mail and commercial interstate carriers, according to the directions thereon, the following items, each mailing constituting a separate count:

COUNT	DATE	FROM	TO	DESCRIPTION OF ITEM
TWO	6/1/18	Birmingham, Alabama	West Chester, Pennsylvania	Misappropriated 2018 U.S. Open tickets, shipped via UPS, tracking number ending in 5686.
THREE	6/1/18	Birmingham, Alabama	West Chester, Pennsylvania	Misappropriated 2018 U.S. Open tickets, shipped via UPS, tracking number ending in 5677.
FOUR	5/18/19	Southern Pines, North Carolina	West Chester, Pennsylvania	Misappropriated 2019 U.S. Open tickets, shipped via UPS, tracking number ending in 6939.

All in violation of Title 18, United States Code, Section 1341.

COUNT FIVE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 13 of Count One are incorporated here.

THE SCHEME

2. Beginning in or about March 2013 and continuing until in or about March 2020, within the Eastern District of Pennsylvania, the District of New Jersey, and elsewhere, defendant

JEREMI MICHAEL CONAWAY,

together and with co-schemers known to the United States Attorney, devised and intended to devise a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

3. Paragraphs 15 through 27 of Count One are incorporated here.

WIRE FRAUD

4. On or about the following date, in the Eastern District of Pennsylvania, and elsewhere, defendant

JEREMI MICHAEL CONAWAY,

alone and with co-schemers known to the United States Attorney, for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below:

COUNT	DATE	ORIGIN OF WIRE	TRAVELED INTERSTATE THROUGH	METHOD OF WIRE AND DESCRIPTION
FIVE	5/24/2018	Eastern District of Pennsylvania	Google data center outside the state of Pennsylvania	Email sent by defendant JEREMI MICHAEL CONAWAY to co-conspirator Robert Fryer containing a list of the outstanding 2018 U.S. Open tickets defendant CONAWAY was still expecting to receive from co-conspirator Fryer.

All in violation of Title 18, United States Code, Section 1343.

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1341, 1343, and 1349 set forth in this information, defendant

JEREMI MICHAEL CONAWAY

shall forfeit to the United States of America any property constituting, or derived from, proceeds traceable to the commission of such offenses, including but not limited to \$1,276,134 in United States currency (money judgment).

2. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c) incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and 28 U.S.C. Section 2461.


for
JENNIFER ARBITTIER WILLIAMS
ACTING UNITED STATES ATTORNEY

No. -----

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

JEREMI MICHAEL CONAWAY

INFORMATION

Counts:

18 U.S.C. § 1349 (conspiracy to commit mail and wire fraud – 1 count); 18 U.S.C. § 1341 (mail fraud – 3 counts); 18 U.S.C. § 1343 (wire fraud – 1 count); Notice of forfeiture

A true bill.

Foreman

Filed in open court this _____ day,
Of _____ A.D. 20_____

Clerk

Bail, \$ _____